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8 Attorney for Chapter 7 Trustee
9 Karen Sue Naylor

10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **SANTA ANA DIVISION**

13 In re) Case No. 8:17-bk-11664 TA
14)
15 **HANNAH KIM**) Chapter 7
16)
17 Debtor) **STIPULATION EXTENDING TIME**
18) **FOR THE CHAPTER 7 TRUSTEE AND**
19) **THE OFFICE OF THE UNITED STATES**
20) **TRUSTEE AND ALL CREDITORS TO**
21) **OBJECT TO THE DISCHARGE OF THE**
22) **DEBTOR PURSUANT TO TITLE 11**
23) **U.S.C. § 523 AND FOR CREDITORS TO**
24) **OBJECT TO THE DISCHARGEABILITY**
25) **OF CERTAIN DEBTS PURSUANT TO**
26) **TITLE 11 U.S.C. §727**
27)
28) [No hearing set]

21 This stipulation by and between the Chapter 7 Trustee, Karen Sue Naylor, by
22 and through her counsel, William M. Burd, the Office of the United States Trustee by
23 Michael Hauser and Debtor Hannah Kim, by and through her counsel, Dana M.
24 Douglas, is made with reference to the following facts:

25 1. On April 26, 2017, Hannah Kim filed a voluntary petition for relief under
26 Chapter 13 of Title 11, United States Code.

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1 2. On August 11, 2017, the Debtor's bankruptcy case was converted to a
2 case under Chapter 7 of Title 11, United States Code.

3 3. Karen Sue Naylor is the duly appointed, qualified and acting Chapter 7
4 Trustee for the bankruptcy estate of Hannah Kim.

5 4. The original Section 341(a) hearing was held on September 14, 2017.
6 The Section 341(a) hearing was held on that date, has been continued from time to time
7 and is currently set for March 28, 2018, and will likely be continued again. The Trustee
8 has requested substantial documentation and information from the Debtor.

9 5. By order entered November 26, 2017 the deadline for all parties in interest
10 to file an action under 11 U.S.C. § 523 or § 727 was extended to March 30, 2018.

11 6. Because the Trustee and creditors have not yet completed their
12 examination of the Debtor at a Section 341(a) hearing and due to the substantial
13 amount of documentation and information requested of the Debtor, it is necessary to
14 extend the deadline for filing complaints under Sections 523 and 727 to allow the
15 Trustee and the Office of the United States Trustee and all of the Debtor's creditors time
16 to investigate the assets and financial affairs of the Debtor.

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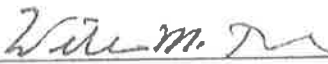
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1 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE AS
2 FOLLOWS:


3 The Chapter 7 Trustee and the Office of the United States Trustee and all
4 creditors of the Debtor shall have up to and including October 1, 2018 to object to the
5 Debtor's discharge pursuant to Section 727 of the Bankruptcy Code. In addition, all
6 creditors shall have up to and including October 1, 2018 to file complaints to determine
7 nondischargeability of debt pursuant to Section 523 of the Bankruptcy Code.

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9 Date: March 27, 2018

CHAPTER 7 TRUSTEE

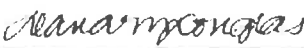
10 
11 By: William M. Burd
12 General Counsel for Karen Sue Naylor
13 Chapter 7 Trustee

14
15 Date: MARCH 27, 2018

16 
17 By: Michael Hauser
18 Office of the United States Trustee

19 Date: March 27, 2018

DANA M. DOUGLAS ATTORNEY AT LAW

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21 By: Dana M. Douglas
22 Counsel for Debtor
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
200 West Santa Ana Boulevard, Suite 400, Santa Ana, CA 92701

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION EXTENDING TIME FOR THE CHAPTER 7 TRUSTEE AND THE OFFICE OF THE UNITED STATES TRUSTEE AND ALL CREDITORS TO OBJECT TO THE DISCHARGE OF THE DEBTOR PURSUANT TO TITLE 11 U.S.C. § 523 AND FOR CREDITORS TO OBJECT TO THE DISCHARGEABILITY OF CERTAIN DEBTS PURSUANT TO TITLE 11 U.S.C. §727** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) March 28, 2018, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Ali Ammar info@silveradoip.com
- Julian K Bach Julian@Jbachlaw.com, julianbach@sbcglobal.net
- William M Burd wmburd@burd-naylor.com, jzayicek@burd-naylor.com
- Dana M Douglas dmddouglas@hotmail.com
- Nichole Glowin nglowin@wrightlegal.net, BKUDGeneralupdates@wrightlegal.net
- Jai H Kim jhkim@kringandchung.com, G13995@notify.cincompass.com
- Charles L Murray cm3esquire@sbcglobal.net, cm3esquire@sbcglobal.net
- Charles L Murray cm3esquire@sbcglobal.net
- Karen S Naylor (TR) acanzone@burd-naylor.com, knaylor@IQ7technology.com
- United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page.

2. **SERVED BY UNITED STATES MAIL:**

On (*date*) March 28, 2018, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor: Hannah Kim, 4371 Pioneer Street, Irvine, CA 92604

Hon. Judge Theodor C. Albert
U.S. Bankruptcy Court
411 West Fourth Street, Suite 5085
Santa Ana, CA 92701

☐ Service information continued on attached page.

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) April _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

March 28, 2018
Date

Jaimee Zayicek
Type Name


Signature